



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 8MO

April 1, 2019

Mr. Josh Bryson
Operations Project Manager
Atlantic Richfield Company
317 Anaconda Road
Butte, Montana 59701

Mr. Jon Sesso
Superfund Coordinator
Butte-Silver Bow County
155 W. Granite St., Room 108
Butte, Montana 59701

Re: Comment letter for the Butte Priority Soils Operable Unit (BPSOU) Draft Final Solid Media Program Plan (dated November 2, 2018)

Dear Josh and Jon:

The U. S. Environmental Protection Agency (EPA), in consultation with the Montana Department of Environmental Quality (DEQ), is providing comments on the *Butte Priority Soils Operable Unit (BPSOU) Draft Final Solid Media Program Plan* (dated 11/2/18). Please address the comments below and submit a revised final version of these documents for EPA and DEQ review.

General Comment:

- 1) Early in the document (i.e., Section 1.0 or 2.0), please add a paragraph explaining the purpose and role of the Solid Media Program Plan document.
- 2) Please note that there are several other appendices that make up this program plan. Comments and revisions will follow under a separate cover. Once Appendices A-F have been finalized a submittal of the complete program plan will be required.


Specific Comments:

- 1) Section 1.0, Introduction. Please modify the second and third sentences of the second paragraph to read: "...above action levels described in the EPA BPSOU Record of Decision (ROD) (EPA, 2006) require response actions to meet established criteria. This BPSOU Solid Media Program Plan encompasses the various programs in place to appropriately address residential abatements and land reclamation and provide the means to sustain reclamation efforts in BPSOU through perpetuity. Additionally, it is worth noting in the introduction that sediments will be addressed under the Surface Water Management Plan.

- 2) Section 1.1, Background. In the first paragraph, please modify the third sentence to say, “The *two* primary streams are Blacktail Creek... and Silver Bow Creek below its confluence with Blacktail Creek.” and the second to last sentence to read “...the upper Silver Bow Creek surface channel (*formerly known as the Metro Storm Drain*) is generally dry...”
- 3) Section 2.2, Unreclaimed Areas. In the third paragraph, please revise the fifth sentence to remove the period after “historic mine waste,” and revise the end of the sentence to read, “submitted for EPA approval in consultation with DEQ.”
- 4) Section 2.3, Residential Metals Abatement Program (RMAP). Please modify the first sentence of the first paragraph to read: “...with concentration levels above the soil, dust, or vapor action levels listed in Table 12-1...”
- 5) Section 2.5, Institutional Controls. In the second sentence, please remove the parenthetical “(covenants)” after “Deed notices.” This first paragraph focuses on the informational notice to the deed, as well as access agreements. The restrictive covenant IC is discussed in the following paragraph.
- 6) Section 2.6, Street Maintenance and Snow Management Plan. Please expand this section to include a discussion of the sampling of sediments and snow pile remnants and the disposal of these materials if they exceed action levels or are being transported beyond the storage location. Appendix C of the Draft Street & Snow Management Plan (dated June 11, 2018) had a placeholder for a Solid Media Quality Assurance Project Plan (QAPP). It was EPA’s understanding that this Solid Media QAPP was going to include reference to the sample collection procedures for testing sand materials and snow storage confirmation samples. Please clarify which QAPP will include procedures for collecting samples associated with the Street & Snow Management Plan. EPA suggest that these procedures be included in the RMAP QAPP.
- 7) Section 4.0, Unreclaimed Areas. Please modify the second sentence of the second paragraph to read: “...source areas have the potential to act as ~~indirect~~-pathways for human exposure...”
- 8) Section 4.3, Solid Media Reclamation Action Levels. The reference “(Pioneer, 2011)” was not readily available at the EPA Records Center. Please provide a copy of this document for filing.
- 9) Section 4.3, Solid Media Logic Diagrams. EPA suggest including the Unreclaimed Area Decision Logic diagram (Appendix A.3) that is included in the Unreclaimed QAPP in both the Solid Media Program Plan and Unreclaimed QAPP. Also, on the Unreclaimed Area Decision Logic diagram, please change the reference to the Butte Hill Revegetation Speciation to a “Corrective Action Plan”.
- 10) Section 5.0 Residential Metals Abatement Program. Note that this section may need to be revised to reflect final agreement on the RMAP program.
- 11) Section 6.0, Data Management. Like the QAPPs and plans, please add the Data Management Plan as an appendix to this document.

If you have any questions or concerns, please call me at (406) 457-5019.

Sincerely,



Nikia Greene
Remedial Project Manager

cc: (email only)

Butte File

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